

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE
LITIGATION

MDL NO. 1456
Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO
01-CV-12257-PBS AND 01-CV-339

Hon. Patti B. Saris

**DECLARATION OF MONICA LAMB CONCERNING REDACTIONS TO
THE TRACK ONE DEFENDANTS MEMORANDUM IN OPPOSITION
TO PLAINTIFFS' MOTION TO STRIKE THE DECLARATION OF
STEVEN J. YOUNG**

I, Monica Lamb, declare as follows:

1. I am an associate at Davis Polk & Wardwell, attorneys for AstraZeneca Pharmaceuticals LP in the above-captioned case.
2. I submit this declaration in connection with certain redactions made to the publicly-filed version of the Track One Defendants' Memorandum in Opposition to Plaintiffs' Motion to Strike the Declaration of Steven J. Young. I am knowledgeable about the matters described below.
3. Pursuant to the Protective Order entered by this Court on December 13, 2002 (the "Protective Order") and in accordance with agreements reached with counsel, various party and non-party witnesses have designated certain documents, testimony, and other information produced in this litigation as either "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL".
4. On January 20, 2005, the Track One Defendants moved this Court for leave to file their Memorandum in Opposition to Plaintiffs' Motion to Strike

the Declaration of Steven J. Young under seal. On January 27, 2005, this Court issued an electronic order granting the Track One Defendants' motion for leave to file under seal, and further ordered that "the parties shall file public redacted versions within 10 days."

5. I am supplying this Declaration in accordance with this Court's October 26, 2004 electronic Order, which provided that trade secrets "may be redacted with an affidavit to establish good cause."

6. At my direction, four sentences or partial sentences have been redacted from the Track One Defendants' Memorandum in Opposition to Plaintiffs' Motion to Strike the Declaration of Steven J. Young, because these sentences contain or rely upon information that has been designated as confidential and highly confidential within the meaning of the Protective Order.

7. The redacted material is believed to be highly proprietary in nature and may include trade secrets. The redactions, which are indicated by the legend "REDACTED," have been made on the basis of designations made by the parties and third-party witnesses in the case, in good faith and for good cause shown.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

New York, New York,

February 4, 2005.

/s/ Monica Lamb
Monica Lamb